

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

UNITED STATES OF AMERICA,)	
)	
)	Case No. 3:21-cr-00288
v.)	William L. Campbell, Jr.
)	U.S. District Court Judge
)	
BRYON BROCKWAY.)	

**RESPONSE IN OPPOSITION TO GOVERNMENT’S MOTION TO EXCLUDE
INADMISSIBLE AND IRRELEVANT CHARACTER EVIDENCE OF WITNESSES
AND LIMIT CROSS-EXAMINATION**

Comes now the Defendant, Bryon Brockway, through counsel, Luke A. Evans, and hereby responds in opposition to the Government’s “Motion in Limine to Exclude Inadmissible and Irrelevant Character Evidence of Witnesses and Limit Cross-Examination.” (D.E. 293, PageID # 1460-1464). Defendant Brockway does not oppose the government’s request to have a jury-out hearing; however, he submits that the Government should be required to contemporaneously object during trial. The Government’s Motion seeks the limit Mr. Brockway’s constitutional right to present a defense and cross-examine witnesses against him at trial. Mr. Brockway submits that the Government’s Motion is premature and fails to specifically raise any concrete evidentiary issue; therefore, he respectfully requests that the Government’s Motion in Limine (D.E. 293) be denied.

Respectfully submitted,

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/s/ Luke A. Evans

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Certificate of Service

I hereby certify that on September 12, 2023, I electronically filed the foregoing Notice with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: **Robert McGuire** and **Brooke Farzad**, Assistant United States Attorneys, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ Luke A. Evans

LUKE A. EVANS